

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket No. 2016-330-E

In re:)	
)	
Dick Lee Goold,)	
Complainant/Petitioner,)	AFFIDAVIT OF
)	KIM H. SMITH
v.)	
)	
Duke Energy Carolinas, LLC,)	
Defendant/Respondent.)	
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PERSONALLY appeared before me, Kim H. Smith who first being duly sworn did state as follows:

1. My name is Kim H. Smith and I am Regulatory Affairs Manager for Duke Energy Carolinas, LLC ("Duke Energy Carolinas" or "DEC"). I am responsible for directing the proper administration of Duke Energy Carolinas' rate schedules and service regulations and the Public Service Commission of South Carolina's ("Commission") rules and regulations. I am also responsible for the investigation of customer complaints received through the Commission and the Office of Regulatory Staff ("ORS").

2. This affidavit is based upon my personal knowledge and review of documents received and maintained in the ordinary course of business by Duke Energy Carolinas. I am familiar with the records of Duke Energy Carolinas that pertain to the residential account for 1924 McCormick Highway, Greenwood, South Carolina 29646 ("location at issue"). I have personally worked on said documents and records, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Duke Energy Carolinas, which were made at or about the time of the events, recorded, and which

are maintained in the ordinary course of business by Duke Energy Carolinas. If called as a witness, I could and would testify to the same.

3. I assisted our attorneys in preparing Duke Energy Carolinas' Motion for Summary Judgment and Memorandum in Support ("Motion"). I have read the Motion and verify that the information contained within the Motion is accurate and true to the best of my knowledge, information, and belief.

4. I have reviewed the billing history and DEC account information for the location at issue. The Complainant Dick Lee Goold is not the customer of record for the location at issue. This location is part of the area purchased from the Greenwood County Electric Power Commission. According to DEC's records, Mr. Goold is not now and has not been a customer of DEC since November 2003. DEC's privacy policies prevent the company from discussing a customer's account with another individual unless the customer has provided specific authorization to do so. The customer of record for the location at issue has not provided such authorization.

5. According to DEC's business records Mr. Goold contacted DEC in November 2015 complaining of "RF Radiation & RF Leakage" at both the 214 Holly Avenue and 1924 McCormick Highway residences in Greenwood. DEC does not provide electric service to the residence at Holly Avenue. It is served by the Greenwood Commissioners of Public Works ("CPW").

6. When Mr. Goold contacted ORS earlier this year, DEC advised that Mr. Goold was not the customer of record. The ORS letters attached to the Motion for Summary Judgment as **Exhibit 1** are true and accurate copies of records maintained by Duke Energy Carolinas in the ordinary course of business.

FURTHER AFFIANT SAYETH NOT.

Dated this 19 day of September, 2016.


DUKE ENERGY CAROLINAS



Kim H. Smith
Regulatory Affairs Manager

SWORN TO BEFORE ME

This 19th day of September, 2016.


Print Notary Name: Thomas J. Reed-Hall
Notary Public for Gaston County
My Commission Expires: 7-30-17

